

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>24-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>VU VO</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>JOEL TORRES RODRIGUEZ</b>	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 2 counts)</b>
<b>CHRISTOPHER FETTERS</b>	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity theft -1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to the indictment:

1. Defendant VU VO obtained fraudulent driver's licenses and other personal identifying information of individuals who held bank accounts in Philadelphia, Pennsylvania, and elsewhere.
2. Defendant CHRISTOPHER FETTERS participated in a scheme with defendant VU VO to steal funds from the personal bank accounts of individuals for whom defendant VO obtained fraudulent identity documents.
3. Defendant JOEL TORRES RODRIGUEZ participated in a scheme with defendants VU VO and CHRISTOPHER FETTERS to steal funds from the personal bank account of R.M., who is known to the grand jury, for whom defendant VO obtained fraudulent identity documents.

### **MANNER AND MEANS**

It was part of the scheme that:

4. Wells Fargo Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. Gadriela Ortiz, charged elsewhere, was employed by Wells Fargo Bank as a teller at one of Wells Fargo Bank's branch offices in Philadelphia, Pennsylvania.

6. Sometime before on or about January 18, 2022, defendant VU VO obtained the name, social security number and other personally identifying information, including the Wells Fargo Bank account number, for R.M., without R.M.'s knowledge and permission.

7. Sometime before on or about January 18, 2022, defendant VU VO obtained a fake drivers' license with R.M.'s name and personal identifying information bearing a photograph of defendant CHRISTOPHER FETTERS.

8. On or about January 18, 2022, Gadriela Ortiz sent a text to a Telegram group chat which included defendants VU VO and JOEL TORRES RODRIGUEZ, with a photograph of herself and the number of the teller window at Wells Fargo Bank where she was working that day, so that defendant VO and/or defendant TORRES RODRIGUEZ could direct defendant FETTERS, who was posing as legitimate account holder R.M., to Ortiz's window.

9. On or about January 18, 2022, defendant CHRISTOPHER FETTERS, posing as R.M., walked up to Gadriela Ortiz's teller window and presented her with a withdrawal slip for \$40,000 from R.M.'s account. The withdrawal slip contained R.M.'s forged signature.

Defendant FETTERS requested \$20,000 in cash and a \$20,000 cashier check made out to defendant JOEL TORRES RODRIGUEZ.

10. Because the total amount of the withdrawal requested was over \$20,000, Wells Fargo Bank required a supervisor to approve the transaction after verifying the account holder's identity. Gadriela Ortiz presented to her supervisor, Person 1, the fake driver's license for R.M. Further, defendant CHRISTOPHER FETTERS accurately recited R.M.'s social security number and he correctly answered challenge questions assigned to R.M.'s account. Person 1 approved the transaction based on these false pretenses. Ortiz gave defendant FETTERS \$20,000 cash and a cashier's check for \$20,000 made out to defendant JOEL TORRES RODRIGUEZ.

11. On or about January 18, 2022, defendant JOEL TORRES RODRIGUEZ deposited the \$20,000 cashier's check obtained by defendant CHRISTOPHER FETTERS into defendant TORRES RODRIGUEZ's personal account ending in 6971 held at Wells Fargo Bank. The next day, defendant TORRES RODRIGUEZ withdrew the \$20,000 from his account at Wells Fargo Bank.

12. After the fraudulent transaction at Wells Fargo Bank was completed, defendant VU VO paid \$4,000 cash to Gadriela Ortiz for her role in knowingly facilitating the scheme.

13. On or about January 18, 2022, in the Eastern District of Pennsylvania, defendants

**VU VO,  
JOEL TORRES RODRIGUEZ, and  
CHRISTOPHER FETTERS**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Wells Fargo Bank, and to obtain monies owned by and under the care, custody, and control of Wells Fargo Bank by means of false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to the indictment:

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. Santander Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**MANNER AND MEANS**

It was part of the scheme that:

3. Sometime before on or about January 25, 2022, defendant VU VO obtained the name, social security number and other personally identifying information, including the Santander Bank account number, for A.V., without A.V.'s knowledge and permission.
4. Defendant VU VO obtained a fake drivers' license with A.V.'s name and personal identifying of A.V. bearing a photograph of defendant CHRISTOPHER FETTERS.
5. On or about January 25, 2022, at defendant VO's direction, defendant CHRISTOPHER FETTERS went to a Santander Bank branch located in Philadelphia, Pennsylvania and withdrew \$7,400 cash from A.V.'s account using the fake driver's license and a fake credit card in A.V.'s name as proof of identity.
6. On or about January 25, 2022, in the Eastern District of Pennsylvania, defendants

**VU VO and  
CHRISTOPHER FETTERS**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to

defraud Santander Bank, and to obtain monies owned by and under the care, custody, and control of Santander Bank by means of false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Sections 1344 and 2.



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 3 of Count One are incorporated here.
2. On or about January 18, 2022, in the Eastern District of Pennsylvania,

defendant

**VU VO**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, R.M.'s name, social security number, and date of birth, during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Count One, knowing that the means of identification belonged to a real person.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in this indictment, defendants

**VU VO,  
JOEL TORRES RODRIGUEZ, and  
CHRISTOPHER FETTERS**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

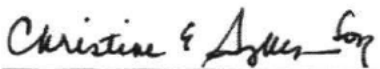


property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

**A TRUE BILL:**

   
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**GRAND JURY FOREPERSON**

  
\_\_\_\_\_  
**JACQUELINE C. ROMERO**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**VU VO  
JOEL TORRES RODRIGUEZ  
CHRISTOPHER FETTERS**

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**INDICTMENT**

Counts

**18 U.S.C. § 1344 (bank fraud - 2 counts)  
18 U.S.C. § 1028A (aggravated identity theft -1 count)  
18 U.S.C. § 2 (aiding and abetting)  
Notice of forfeiture**

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A true bill.

\_\_\_\_\_  
Foreperson

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Filed in open court this 5<sup>th</sup> day,  
Of March A.D. 20 24

\_\_\_\_\_  
Foreperson

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Bail, \$ \_\_\_\_\_

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